

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -	X	
	:	
UNITED STATES OF AMERICA	:	<u>INFORMATION</u>
	:	
- v. -	:	19 Cr.
	:	19 CRIM 665
RAYMOND REID COLLINS JR.,	:	
	:	
Defendant.	:	
- - - - -	X	

COUNT ONE

The United States Attorney charges:

1. From at least in or about August 2016, up to and including at least in or about October 2016, in the Southern District of New York and elsewhere, RAYMOND REID COLLINS JR., the defendant, knowingly did possess and access with intent to view, and attempt to possess and access with intent to view, a book, magazine, periodical, film, videotape, computer disk, and other material that contained an image of child pornography, including an image of child pornography involved in the offense which involved a prepubescent minor and a minor who had not attained 12 years of age, that had been mailed, shipped and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, shipped and transported in and

affecting interstate and foreign commerce by any means, including by computer, to wit, COLLINS possessed and accessed with the intent to view images and videos of child pornography, including an image of a prepubescent minor, which were stored in a cloud storage account, from his residence in New Jersey and his office in New York, New York.

(Title 18, United States Code, Sections 2252A(a)(5)(B), (b)(2) and 2.)

FORFEITURE ALLEGATION

2. As a result of committing the offense alleged in Count One of this Information, RAYMOND REID COLLINS JR.; the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, any and all property, real and personal, constituting or traceable to gross profits or other proceeds obtained from said offense and any and all property, real or personal, used or intended to be used to commit or promote the commission of said offense or traceable to such property, including but not limited to the following specific property:

- a. Apple iPhone with IMEI 355321080690812;
- b. Apple iPhone with FCC Number BCG-E2946A; and
- c. Dell Inspiron laptop with serial number 71YCQY1.

Substitute Assets Provision

3. If any of the above-described forfeitable property, as

a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 2253;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)

Geoffrey S. Berman
GEOFFREY S. BERMAN
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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19 Cr.

(18 U.S.C. §§ 2252A(a)(5)(B), (b)(2)
and 2.)

GEOFFREY S. BERMAN
United States Attorney
